

EXHIBIT 81

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

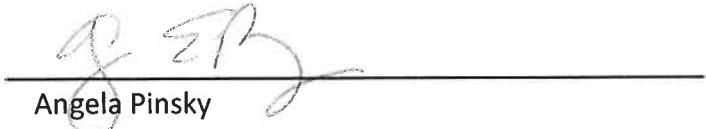
CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Defendants.

Pursuant to 28 U.S.C. § 1746(2), I, Angela Pinsky, hereby declare as follows:

1. I am over the age of eighteen and competent to testify.
2. I am the Executive Director of the Association for a Better New York, a non-profit membership organization for businesses and employers who advocate to make New York City a better place to live, work, and visit. ABNY has 266 members who employ hundreds of thousands of New Yorkers, and many which are national and multi-national organizations. All ABNY members have a presence in New York City and industries represented include construction/real estate, retail, professional services, cultural institutions, non-profit organizations, educational and medical institutions, finance, and infrastructure organizations. ABNY has 3 full time employees, none of which are DACA grantees.
3. ABNY has promoted the diversity of New York City as a strength for economic development, quality of life, competitiveness, and desirability. A major contributing factor is the percentage of "New New Yorkers" representing foreign born residents, as well as children of foreign born residents. According to the NYC Department of City Planning, in 2016 over 3 million of New York City's residents were immigrants (foreign-born individuals) doubling the percentage of immigrants since 1965 to 37%. Approximately 6-in-10 New Yorkers are either immigrants or the children of immigrants.
4. A wide variety of campaigns directed at individuals and organizations to locate in New York City highlight diversity of the population as a motivation, including towards individual businesses such as the "New York Open for Business" Campaign or the bid for the 2nd headquarters of Amazon; major national or international conventions including the NYC2012 Olympic Bid, the 2008 Republican National Convention, and the 2016 Democratic National Convention Bid; and even campaigns directed at individuals including the C'mon Lebron campaign of 2010.
5. According to FWD.US, there are 38,430 DACA recipients in New York State, 87% of whom are employed in the State, and if DACA is repealed and not replaced with a permanent legislative solution, New York will lose more than 33,400 workers and \$2.3 billion in annual GDP
6. The economic benefit of documented and undocumented immigrants and DACA grantees to the state is significant. According to the American Immigration Council, immigrant-led households in the state paid \$26.5 billion in federal taxes and \$15.9 billion in state and local taxes in 2014. Undocumented immigrants in New York paid an estimated \$1.1 billion in state and local taxes in 2014. Their contribution would increase to \$1.3 billion if they could receive legal status. Undocumented immigrants who were enrolled in the DACA program in 2016 paid an estimated \$140 million in state and local taxes.

I declare under penalty of perjury that the foregoing is true and correct.



Angela Pinsky